

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

Civil Action No. 05-292 (JJF)

**LOCAL RULE 7.1.1 STATEMENT IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL DEPOSITION TESTIMONY
AND FOR SANCTIONS [D.I. 198]**

The undersigned attorney for plaintiff, LG.Philips LCD Co., Ltd. ("LPL") hereby states, pursuant to Local Rule 7.1.1, that LPL's attorneys have made a reasonable effort to reach agreement with opposing counsel on the matters set forth in LPL's Motion to Compel Deposition Testimony and for Sanctions (the "Motion") [D.I. 198]. Specifically, counsel states the following:

(1) The Motion deals with depositions LPL is taking of defendants on an expedited basis in preparation for the trial that will commence on July 17. The Motion seeks relief as a result of defense counsel's repeated improper instructions to the deponents not to answer and repeated improper coaching of deponents through objections and interjected questions.

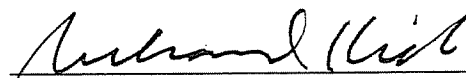
(2) LPL's counsel repeatedly asked defense counsel to refrain from making improper objections and from coaching the witnesses, as shown throughout the transcripts that were attached to the Motion as Exhibits 1-4. Despite repeated requests to refrain, defense counsel did not comply.

not comply.

(3) LPL's counsel informed defense counsel repeatedly that continued improper deposition behavior would require LPL to seek relief from the Court. LPL's counsel sent defense counsel written notice before the Motion was filed that LPL would be seeking relief from the Court.

May 31, 2006

THE BAYARD FIRM



Richard D. Kirk (rk0922)

222 Delaware Avenue, Suite 900

P.O. Box 25130

Wilmington, DE 19899-5130

(302) 655-5000

rkirk@bayardfirm.com

Counsel for plaintiff,

LG.Philips LCD Co., Ltd.

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on May 31, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Robert W. Whetzel, Esq.
Matthew W. King, Esq.
Richards, Layton & Finger
One Rodney Square
P.O. Box 551
Wilmington, DE 19899

The undersigned counsel further certifies that copies of the foregoing document were sent on May 31, 2006 by email and by hand to the above counsel and by email and first class mail to the following non-registered participants:

Christine A. Dudzik, Esq.
Thomas W. Jenkins, Esq.
Howrey LLP
321 North Clark Street
Suite 3400
Chicago, IL 60610

Teresa M. Corbin, Esq.
Glenn W. Rhodes, Esq.
Julie Gabler, Esq.
Howrey LLP
525 Market Street
Suite 3600
San Francisco, CA 94105

/s/ Richard D. Kirk (rk0922)
Richard D. Kirk

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

Civil Action No. 05-292 (JJF)

**LOCAL RULE 7.1.1 STATEMENT IN SUPPORT OF
PLAINTIFF'S SECOND MOTION TO COMPEL DEPOSITION TESTIMONY
AND FOR SANCTIONS [D.I. 199]**

The undersigned attorney for plaintiff, LG.Philips LCD Co., Ltd. ("LPL") hereby states, pursuant to Local Rule 7.1.1, that LPL's attorneys have made a reasonable effort to reach agreement with opposing counsel on the matters set forth in LPL's Second Motion to Compel Deposition Testimony and for Sanctions (the "Second Motion") [D.I. 199]. Specifically, counsel states the following:

(1) The Second Motion deals with depositions LPL is taking of defendants on an expedited basis in preparation for the trial that will commence on July 17. The Second Motion seeks relief as a result of (a) defendants' presentation of corporate witnesses inadequately prepared to testify under Fed. R. Civ. P. 30(b)(6); and (b) defense counsel's repeated improper consultation with deponents during the course of depositions.

(2) LPL's counsel asked defense counsel to present corporate witnesses adequately prepared to testify under Fed. R. Civ. P. 30(b)(6), but defense counsel stated their belief that the witnesses were adequately prepared. LPL's counsel also asked the witnesses to disclose the

substance of discussions with counsel that took place during the depositions concerning testimony, but counsel refused to allow the witnesses to answer those questions.

May 31, 2006

THE BAYARD FIRM



Richard D. Kirk (rk0922)

222 Delaware Avenue, Suite 900

P.O. Box 25130

Wilmington, DE 19899-5130

(302) 655-5000

rkirk@bayardfirm.com

Counsel for plaintiff,

LG.Philips LCD Co., Ltd.

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on May 31, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Robert W. Whetzel, Esq.
Matthew W. King, Esq.
Richards, Layton & Finger
One Rodney Square
P.O. Box 551
Wilmington, DE 19899

The undersigned counsel further certifies that copies of the foregoing document were sent on May 31, 2006 by email and by hand to the above counsel and by email and first class mail to the following non-registered participants:

Christine A. Dudzik, Esq.
Thomas W. Jenkins, Esq.
Howrey LLP
321 North Clark Street
Suite 3400
Chicago, IL 60610

Teresa M. Corbin, Esq.
Glenn W. Rhodes, Esq.
Julie Gabler, Esq.
Howrey LLP
525 Market Street
Suite 3600
San Francisco, CA 94105

/s/ Richard D. Kirk (rk0922)
Richard D. Kirk